

UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF WISCONSIN

THE ESTATE OF THE UNBORN CHILD OF
JENNIFER JAWSON; AND
JENNIFER JAWSON,

Plaintiffs,

Case No. 19-CV-01008-LA

v.

MILWAUKEE COUNTY, *et al.*,

Defendants.

**DECLARATION OF STEPHEN T. TRIGG IN SUPPORT OF
INJURED PATIENTS AND FAMILIES COMPENSATION FUND'S
MOTION IN LIMINE TO EXCLUDE DEMONSTRATIVE PHOTOGRAPHS**

Pursuant to 28 U.S.C. § 1746, Stephen T. Trigg declares as follows:

1. I am an attorney representing defendant Injured Patients and Families Compensation Fund (the "Fund") in this matter. I am authorized to make this declaration in support of the Fund's motion in limine to exclude demonstrative photographs, and I make this declaration on the basis of my personal knowledge of the facts set forth herein.

2. Attached as Exhibit A is a true and correct copy of an email from plaintiffs' counsel.

3. Attached as Exhibit B is an excerpt from Ms. Jawson's medical records obtained from Ascension Columbia St. Mary's Hospital Milwaukee, bates numbered CSM 235-236, 293-296, 308.

4. Attached as Exhibit C is an excerpt from Ms. Jawson's medical records obtained from Aurora Sinai Medical Center, bates numbered Aurora 63, 66-67.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 24, 2024.

/s/ Stephen T. Trigg
Stephen T. Trigg